

EXHIBIT 1-22

- IV. With respect to the Fourth Cause of Action (Piercing the Corporate Veil and Alter Ego):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
 - iv. Punitive damages in an amount to be determined at trial;
 - v. Declaratory judgment that Defendant Angelov is the alter ego of Blue Finance and All Seas Management; and
 - vi. Such other, further and different relief as this Court deems just and proper.
- V. With respect to the Fifth Cause of Action (Fraudulent Transfer of Debtor's Interest in Property):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- VI. With respect to the Sixth Cause of Action (Breach of Contract):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- VII. With respect to the Seventh Cause of Action (Breach of Contract):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

VIII. With respect to the Eighth Cause of Action (Breach of Contract):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

IX. With respect to the Ninth Cause of Action (Tortious Interference with Contract):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

iv. Punitive damages in an amount to be determined at trial; and

v. Such other, further and different relief as this Court deems just and proper.

X. With respect to the Tenth Cause of Action (Breach of Fiduciary Duty):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

XI. With respect to the Eleventh Cause of Action (Aiding and Abetting Breach of Fiduciary Duty):

- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XII. With respect to the Twelfth Cause of Action (Breach of Fiduciary Duty):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XIII. With respect to the Thirteenth Cause of Action (Aiding and Abetting Breach of Fiduciary Duty):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XIV. With respect to the Fourteenth Cause of Action (Unjust Enrichment):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
 - iv. Punitive damages in an amount to be determined at trial; and
 - v. Such other, further and different relief as this Court deems just and proper.
- XV. With respect to the Fifteenth Cause of Action (Fraudulent Concealment):

- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XVI. With respect to the Sixteenth Cause of Action (Fraudulent Concealment):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
 - iv. Punitive damages in an amount to be determined at trial; and
 - v. Such other, further and different relief as this Court deems just and proper.
- XVII. With respect to the Seventeenth Cause of Action (Fraud):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
 - iv. Punitive damages in an amount to be determined at trial; and
 - v. Such other, further and different relief as this Court deems just and proper.
- XVIII. With respect to the Eighteenth Cause of Action (Aiding and Abetting Fraud):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

- iv. Punitive damages in an amount to be determined at trial; and
 - v. Such other, further and different relief as this Court deems just and proper.
- XIX. With respect to the Nineteenth Cause of Action (Fraudulent Conveyance by Insolvent):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XX. With respect to the Twentieth Cause of Action (Conveyance Made with Intent to Defraud):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
 - iv. Punitive damages in an amount to be determined at trial; and
 - v. Such other, further and different relief as this Court deems just and proper.
- XXI. With respect to the Twenty-first Cause of Action (Negligent Misrepresentation):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
 - ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;
 - iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and
 - iv. Such other, further and different relief as this Court deems just and proper.
- XXII. With respect to the Twenty-second Cause of Action (Negligence):
- i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;